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f/k/a Facebook, Inc.; Facebook Holdings, LLC;
Facebook Operations, LLC; Meta Payments Inc.
f/k/a Facebook Payments Inc.; Meta Platforms
Technologies, LLC f/k/a Facebook Technologies,
LLC; Instagram, LLC; and Siculus LLC f/k/a
Siculus, Inc.*

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

This Document Relates To:

ALL ACTIONS

MDL No. 3047

Case No.: 4:22-md-03047-YGR

**DECLARATION OF ASHLEY M.
SIMONSEN IN SUPPORT OF
DEFENDANTS' REPLY IN SUPPORT
MOTION TO EXCLUDE GENERAL
CAUSATION TESTIMONY OF
PLAINTIFFS' EXPERTS**

Judge: Hon. Yvonne Gonzalez Rogers
Magistrate Judge: Hon. Peter H. Kang

Date: January 26, 2026
Time: 8:00 AM
Place: Courtroom 1, 4th Floor

DECLARATION OF ASHLEY M. SIMONSEN

I, Ashley Simonsen, declare as follows:

1. I am a partner with the law firm Covington & Burling LLP, counsel of record for Defendants Meta Platforms, Inc. f/k/a Facebook, Inc.; Facebook Holdings, LLC; Facebook Operations, LLC; Meta Payments Inc. f/k/a Facebook Payments Inc.; Meta Platforms Technologies, LLC f/k/a Facebook Technologies, LLC; Instagram, LLC; and Siculus LLC f/k/a Siculus, Inc. I have personal knowledge of the following facts, and, if called as a witness, I could and would testify competently thereto.

2. Attached hereto as **Exhibit 1** is a true and correct copy of Combined Order on Defendants' *Sargon Challenges to Plaintiff's Experts Jeremy Johnson and Kevin Shapiro, M.D., and Defendants' Combined Motion for Summary Judgment, Landon R. v. Hain Celestial Group, Inc., et al.,* (Cal. Super Ct. Dec. 3, 2025).

3. Attached hereto as **Exhibit 2** is a true and correct copy of Maartje Boer et al., *Cross-national validation of the social media disorder scale: findings from adolescents from 44 countries*, 117 *Addiction* 784 (2022).

4. Attached hereto as **Exhibit 3** is a true and correct copy of Danish Competition and Consumer Authority, *Young Consumers and Social Media* (2025).

5. Attached hereto as **Exhibit 4** is a true and correct copy of Jacqueline Nesi et al., *Objectively Measured Smartphone Pickups Among Adolescents: Associations With Daily Positive and Negative Affect and Mindfulness*, *Psych. of Popular Media* (2025).

6. Attached hereto as **Exhibit 5** is a true and correct copy of Jolien Trekels et al., *Diverse social media experiences and adolescents' depressive symptoms: the moderating role of neurobiological responsivity to rejected peers*, 19 *Soc. Cognitive and Affective Neuroscience* 1 (2024).

7. Attached hereto as **Exhibit 6** is a true and correct copy of Ruling Document on Defendants' Motion to Exclude Non-Causation Opinions of Arturo Béjar, *Social Media Cases*, JCCP 5255 (Cal. Super Ct. Nov. 10, 2025).

1 I declare under penalty of perjury under the law of the State of California that the foregoing is true
2 and correct. Executed on December 5, 2025, in Los Angeles, California.
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5 DATED: December 5, 2025

By: /s/ Ashley M. Simonsen